

Adam E. Polk (SBN 273000)

Simon S. Grille (SBN 294914)

Trevor T. Tan (SBN 280145)

Reid Gaa (SBN 330141)

Kira Gaia (SBN 355141)
GIRARD SHARP LLP

601 California Street, Suite 1400

301 California Street, San Francisco, CA 94108

Telephone: (415) 981-4800

Facsimile: (415) 981-484

Fax: (415) 551-48
apolk@girardsharp.com

sgrille@girardsharp.com

ttan@girardsharn.com

rgaa@girardsharn.com

www.gurasharp.com

Counsel for Plaintiffs

[Additional Counsel on Signature Page]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

BRAYDEN STARK, JUDD OOSTYEN,
ISAAC BELENKIY, VALERIE BURTON,
LAURA GOODFIELD, and DENOVIAS
MACK, individually and on behalf of all others
similarly situated.

Case No. 3:22-cv-03131-JCS

**JOINT STIPULATION AND [PROPOSED]
ORDER TO EXTEND DEADLINE FOR
PRELIMINARY APPROVAL MOTION**

Plaintiffs,

V.

PATREON, INC.,

Defendant.

STIPULATION

Pursuant to Civil Local Rule 6-2, Plaintiffs Brayden Stark, Judd Oostyen, Isaac Belenkiy, Valerie Burton, Laura Goodfield, and Denovias Mack (“Plaintiffs”) and Defendant Patreon, Inc. (“Patreon”) jointly stipulate as follows:

WHEREAS, in light of the parties' agreement in principle to resolve this action, the Court set June 28 as the deadline for the Parties to execute any final settlement agreement and for Plaintiffs to submit a preliminary approval motion by June 28 (ECF Nos. 164, 168);

WHEREAS, the Court approved a stipulation (ECF No. 170) extending this deadline until July 26 and continuing the Case Management Conference to August 14, with a case management statement due by August 7 (ECF No. 171);

WHEREAS, the parties have substantially completed the settlement documentation and require an additional one-week extension to allow for client approvals and final review of the settlement documentation and coordination with the claims administrator;

NOW THEREFORE, the parties respectfully request that the Court order the following:

- The parties will endeavor to execute a final settlement agreement and Plaintiffs will submit their motion for preliminary approval of the settlement no later than August 2.

A proposed Order granting the foregoing relief appears beneath the signature blocks.

IT IS SO STIPULATED.

Dated: July 26, 2024

Respectfully submitted,

By: /s/ Simon S. Grille
Adam E. Polk (SBN 273000)
Simon S. Grille (SBN 294914)
Trevor T. Tan (SBN 280145)
Reid Gaa (SBN 330141)
GIRARD SHARP LLP
601 California Street, Suite 1400
San Francisco, CA 94108
Telephone: (415) 981-4800
Facsimile: (415) 981-4846
apolk@girardsharp.com
sgrille@girardsharp.com

1 ttan@girardsharp.com
2 rgaa@girardsharp.com
3

4 *Counsel for Plaintiffs*
5

6 Dated: July 26, 2024
7

8 By: /s/ Nathan Walker
9 Fred Norton (CA SBN 224725)
10 fnorton@nortonlaw.com
11 Nathan Walker (CA SBN 206128)
12 nwalker@nortonlaw.com
13 Bree Hann (CA SBN 215695)
14 bhann@nortonlaw.com
15 Gil Walton (CA SBN 324133)
16 gwalton@nortonlaw.com
17 Celine G. Purcell (CA SBN 305158)
18 cpurcell@nortonlaw.com
19 Emily Kirk (CA SBN 348547)
20 ekirk@nortonlaw.com
21 **THE NORTON LAW FIRM PC**
22 299 Third Street, Suite 200
23 Oakland, CA 94607
24 Telephone: (510) 906-4900
25

26 *Counsel for Defendant*
27 *PATREON, INC.*
28

19 **ATTESTATION**

20 I, Simon Grille, am the ECF User whose ID and password are being used to file this document.
21 In compliance with Civil L.R. 5-1(i)(3), I hereby attest that all counsel have concurred in this filing.
22

23 Dated: July 26, 2024
24

25 /s/ Simon Grille
26 Simon Grille
27
28

1 **[PROPOSED] ORDER**

2 **PURSUANT TO STIPULATION, THE COURT ORDERS AS FOLLOWS:**

- 3 • The parties will endeavor to execute a final settlement agreement and Plaintiffs will
4 submit their motion for preliminary approval of the settlement no later than August 2.
5 • The Case Management Conference previously set for August 14 remains on calendar,
6 with a case management statement remaining due by August 7.

7
8 Dated: _____

By: _____

9 Honorable Joseph C. Spero
10 United States District Magistrate Judge